

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW MEXICO**

JOLENE K. YOUNGERS, as the Personal
Representative of the Wrongful Death
Estate of Roxsana Hernandez,

Plaintiff,

v.

1:20-cv-0465 WJ/JHR
Consolidated with
1:21-cv-0620 WJ/JHR

LaSalle Corrections Transport LLC,
LaSalle Corrections West LLC,
LaSalle Management Company LLC,
Global Precision Systems LLC,
TransCor America LLC,
CoreCivic, Inc., and
United States of America,

Defendants,

and

Global Precision Systems, LLC,

Third-Party Plaintiff,

v.

Asset Protection and Security Services, L.P.,

Third Party Defendant.

**DEFENDANT UNITED STATES' UNOPPOSED MOTION
FOR ENTRY OF AMENDED STIPULATED PROTECTIVE
ORDER CONCERNING CONFIDENTIAL MATERIAL**

Defendant United States of America, by undersigned government counsel, respectfully
moves this Court for entry of an Amended Stipulated Protective Order that extends the terms of
the original Stipulated Protective Order, Doc. 98, to the United States and Third-Party Defendant

Asset Protection and Security Services, L.P., parties joined in this action after the original Protective Order was entered.

Pursuant to D.N.M.LR-Civ. 7.1(a), government counsel contacted counsel for all other parties to this action regarding their positions on the motion. Counsel for the parties have reviewed and approved the motion and a proposed Amended Stipulated Protective Order, which the United States will submit to chambers for the Court's consideration.

Wherefore, the United States respectfully requests that the Court grant this unopposed motion by entering the proposed Amended Stipulated Protective Order.

Respectfully submitted,

ALEXANDER M. M. UBALLEZ
United States Attorney

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on December 12, 2022, I filed the foregoing pleading electronically through the CM/ECF system which caused all parties and counsel of record to be electronically served as more fully reflected on the Notice of Electronic Filing.

Filed electronically 12/12/2022
ELIZABETH M. MARTINEZ
Assistant United States Attorney